

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

**NOTICE OF MOTION**

243RD STREET BRONX R&R LLC,

Chapter 11

. Debtor.

Case No. 11-13321(alg)

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**PLEASE TAKE NOTICE**, that upon the annexed Application<sup>1</sup>, dated October 14, 2011, of 243RD STREET LENDER LLC, (the “Secured Creditor”), and the annexed Affidavit of Scott J. Alter, Managing Member of the Secured Creditor, by and through its attorneys Kriss & Feuerstein LLP will move this Court before the Honorable Allan L. Gropper, United States Bankruptcy Judge, Southern District of New York, One Bowling Green, New York, New York, 10004, Courtroom 617, on the 8th day of November, 2011 at 10:00 a.m., or as soon thereafter as counsel can be heard for an Order pursuant to 11 U.S.C. §§ 362(d)(1) and 362(d)(2) lifting the automatic stay, waiving the 14 day stay imposed by FED. R. BANKR.P. 4001(a)(3) and for such further and different relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the instant application must be made in writing and received in the Bankruptcy Clerk’s Office, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York, 10004 and by the undersigned, Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York, New York 10017, no later than three (3) days prior to the hearing date set forth herein.

Dated: October 14, 2011  
New York, New York

KRISS & FEUERSTEIN LLP  
*Attorneys for Movant,*  
243RD STREET LENDER LLC.

s/ Jerold C. Feuerstein  
Jerold C. Feuerstein, Esq. (JF9829)  
360 Lexington Avenue, Suite 1200  
New York, New York 10017  
(212) 661-2900 – telephone  
(212) 661-9397 – facsimile

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<sup>1</sup>Due to the voluminous size of the exhibits referenced herein, exhibits may be obtained from the Court or upon request of counsel.

TO:

MARK A. FRANKEL  
BACKENROTH FRANKEL & KRINSKY,  
LLP  
489 FIFTH AVENUE  
NEW YORK, NY 10017

U.S. TRUSTEE  
UNITED STATES TRUSTEE  
33 WHITEHALL STREET  
21st FLOOR  
NEW YORK, NY 10004

BLUE DIAMOND FUEL OIL CORP.  
149 34<sup>TH</sup> STREET  
BROOKLYN, NY 11232-2303

NEW YORK CITY DEPT OF FINANCE  
345 ADAMS STREET, 3<sup>RD</sup> FLOOR  
NEW YORK, NY 11201-3719

C.S BROWN CO. INC.  
C/O QUALITY 1 MGMT  
PO BOX 1550  
NEW YORK, NY 10039

NYS DEPT OF TAXATION & FINANCE  
BANKRUPTCY SECTION  
PO BOX 5300  
ALBANY, NY 12205-0300

TOTAL FIRE PROTECTION INC.  
5233 AVE. N  
BROOKLYN, NY 11234-3910

CORNER HARDWARE & PAINT  
CENTER  
2266 NOSTRAN AVE  
BROOKLYN, NY 11210-3037

BRIAN A. STARK, ESQ.

TRISTATE REALTY HOLDINGS LLC  
C/O ZALMAN SCHOCHET, ESQ.  
225 BROADWAY, 39<sup>TH</sup> FLOOR  
NEW YORK, NY 10007

CITIBANK, N.A.  
ONE COURT SQUARE  
LONG ISLAND CITY, NY 11120-0001

NYC WATER BOARD  
59-17 JUNCTION BLVD.  
FLUSHING, NY 11373-5108

COUNTY OIL COMPANY INC.  
18-73 42<sup>ND</sup> STREET  
ASTORIA, NY 11105-1026

CON EDISON  
COOPER STATION  
P.O. BOX 138  
NEW YORK, NY 10276-0138

RANGE EMERGENCY REPAIR  
317 WEST 45<sup>TH</sup> STREET  
NEW YORK, NY 10036-3803

QUILL CORPORATION  
WINDOWS  
100 SCHELTER RD  
LINCOLDSHIRE, IL 60069-3621

ALL COUNTY SEWER & DRAIN  
4446 PARK AVE.  
BRONX, NY 10457-2447

PRIME BUILDING & MAINTENANCE

1325 CASTLE HILL AVE  
BRONX, NY 10462-4806

SUPPLY  
436 FERRY STREET  
NEWARD, NJ 07105-3929

METROPOLITAN LUMBER  
175 SPRING STREET  
NEW YORK, NY 10012-3797

L. DELILLO & SON  
1068 BROOK AVE  
BRONX, NY 10456-5204

KW STATEWIDE GLASS AND  
WINDOWS  
354 ROGERS AVE  
BROOKLYN, NY 11225-2908

MAAZEL EXTERMINATOR  
1263 57<sup>TH</sup> STREET  
BROOKLYN, NY 11219-4524

G. BAUER INC.  
1624 WEBSTER AVE.  
BRONX, NY 10457-8016